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Exception Report	186	Version	2	Owner	BearingPoint		
Issued	April 8, 2003	Test	PMR1	Role	Test Manager		
Applicability	Michigan, Illinois, Indiana, Ohio, Wisconsin						

SBC Ameritech has been unable to demonstrate that certain system of record and reporting system data have been retained consistent with regulatory requirements.

Issue

As part of Metrics Data Collection and Storage (PMR1) testing, BearingPoint has requested sample data and files from SBC Ameritech's systems of record and reporting systems to verify that data is retained. Based on a review of this sample data, SBC Ameritech did not demonstrate that it retained data from certain systems consistent with regulatory requirements.¹ These systems are identified in Exhibit 1 below.

Exhibit 1 – Reporting System and System of Record Data Retention Results

System	Oldest Data	Current WI, IL,	Meeting WI, IL,	Current MI	Meeting
·	Currently	IN and OH	IN and OH	Benchmark	Current MI
	Retained	Benchmark	Benchmark? ²		Benchmark? ³
ACIS	January 2002	August 2001	No	January 2001	No
ALPSS	May 2001	August 2001	Yes	January 2001	No
ARIS/EXACT	April 2002	August 2001	No	January 2001	No
CABS	September 2001	August 2001	No	January 2001	No
CAMPS	August 2002	August 2001	No	January 2001	No
CC MIS Wholesale	March 2001	August 2001	Yes	January 2001	No
DUF Parity File	October 2002	August 2001	No	January 2001	No
ICS/DSS	October 2001	August 2001	No	January 2001	No
Manual – Directory	September 2002	August 2001	No	January 2001	No
Assistance Database					
Measures					
Manual – EBTA	December 2001	August 2001	No	January 2001	No
Clear Close					
NSDB	October 2001	August 2001	No	January 2001	No
RBS	August 2001	August 2001	Yes	January 2001	No

As detailed in Exhibit 2, SBC Ameritech has demonstrated that it retained data from certain systems in compliance with requirements, based on a review of sample data.⁴

¹ In the event that SBC Ameritech was unable to provide sample data that confirmed that data was being retained consistent with regulatory requirements, BearingPoint reviewed SBC Ameritech's "System Retention Policy" (SRP) documentation and, in some cases, mainframe system documentation, which indicated that SBC Ameritech had extended the expiration date for data retention to be consistent with regulatory requirements. BearingPoint verified mainframe system documentation for the following systems: ACIS, ALPSS, ARIS/EXACT, CABS, and CAMPS.

² Because the data retention requirements in WI, IN, OH and IL are not explicit regarding the type and length of retention, BearingPoint is using a benchmark of 18 months for retention of system of record and reporting system data. Data retention requirements stemming from the Indiana remedy plan, which was released in late October 2002, have not been incorporated into BearingPoint's current analysis due to the fact that SBC Ameritech and IURC have not agreed on an implementation schedule for the plan.

³ The data retention requirement in Michigan is as follows: "Data should be retained for a minimum of 24 months after the conclusion of the year in which the data was collected or 12 months after the issuance of the audit report, whichever is later." (May 27, 1999 Order, p. 11)



Exhibit 2 – Additional Reporting System and System of Record Data Retention Analysis Results

		ng System and System		<u> </u>	
System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
114_115 Database	September 2000	August 2001	Yes	January 2001	Yes
ACIS ⁵	September 2000	August 2001	Yes	January 2001	Yes
ACT	September 2000	August 2001	Yes	January 2001	Yes
ALDIS Data Warehouse	September 2000	August 2001	Yes	January 2001	Yes
ALPSS	May 2001	August 2001	Yes	January 2001	No
ANSIRS/Volumes	September 2000	August 2001	Yes	January 2001	Yes
ARAF Spreadsheet ⁶	May 2002	August 2001	Yes	January 2001	Yes
BFR Database	September 2000	August 2001	Yes	January 2001	Yes
BFR Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
Broadcast Fax Log	September 2000	August 2001	Yes	January 2001	Yes
CC MIS Repair Centers (CSBs)	September 2000	August 2001	Yes	January 2001	Yes
CC MIS Wholesale	March 2001	August 2001	Yes	January 2001	No
CLEC Comparison Report ⁷	N/A	August 2001	Yes	January 2001	Yes
CLEC Online Website ⁸	March 2001	August 2001	Yes	January 2001	Yes
CLEC Reports, Electronic (IN only)	September 2000	August 2001	Yes	January 2001	Yes
Closed Ticket Disposition Analysis ⁹	October 2001	August 2001	Yes	January 2001	Yes
CODES NRD Due Report Final (Weekly Code Activation Spreadsheet)	September 2000	August 2001	Yes	January 2001	Yes
Collocation Database	September 2000	August 2001	Yes	January 2001	Yes
CORAL	September 2000	August 2001	Yes	January 2001	Yes

⁴ Exhibits 1 and 2 do not represent an exhaustive list of systems of record and reporting systems.

⁵ BearingPoint validated that ACIS data was retained for the Provisioning, Maintenance and Repair and Other measure groups consistent with regulatory requirements.

⁶ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

⁷ According to SBC Ameritech, no data has ever been generated for this system because SBC Ameritech has never had a request from a CLEC for this report.

⁸ According to SBC Ameritech, this system was not involved in performance reporting before March 2001.

⁹ According to SBC Ameritech, this system was not involved in performance reporting before October 2001.



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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Electronic Performance Reporting Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
Error Return Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
FMOD Database	September 2000	August 2001	Yes	January 2001	Yes
Gateway RT62 ¹⁰	April 2001	August 2001	Yes	January 2001	Yes
ICS/DSS ¹¹	April 2002	August 2001	Yes	January 2001	Yes
LASR ¹²	May 2002	August 2001	Yes	January 2001	Yes
LMOS	September 2000	August 2001	Yes	January 2001	Yes
LOC Scheduler	September 2000	August 2001	Yes	January 2001	Yes
LSMS	September 2000	August 2001	Yes	January 2001	Yes
Manual - AMA Critical Error Display Report	September 2000	August 2001	Yes	January 2001	Yes
Manual - Bill Timeliness	Septemb er 2000	August 2001	Yes	January 2001	Yes
Manual - Completion Notification ¹³	October 2000	August 2001	Yes	January 2001	Yes
Manual - Directory Assistance Database Measures ¹⁴	September 2000	August 2001	Yes	January 2001	Yes
Manual - Electronic Completions	September 2000	August 2001	Yes	January 2001	Yes
Manual - EOI Network Database ¹⁵	August 2001	August 2001	Yes	January 2001	Yes
Manual - Excluded Blocked Calls Report ¹⁶	February 2001	August 2001	Yes	January 2001	Yes
Manual - Interface Outage Notification	September 2000	August 2001	Yes	January 2001	Yes

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¹⁰ According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

¹¹ According to SBC Ameritech, the data is retained for three years for the following measure groups: Billing, Collocation, Interconnection Trunks, Maintenance and Repair, and 911. According to SBC Ameritech, this system was not involved in performance reporting for these measure groups before April 2002.

¹² According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

¹³ According to SBC Ameritech, this system was not involved in performance reporting before October 2000.

¹⁴ BearingPoint validated that Manual – Directory Assistance Database Measures data was retained for the Other measure group consistent with regulatory requirements.

¹⁵ According to SBC Ameritech, this system was not involved in performance reporting before August 2001.

¹⁶ According to SBC Ameritech, this system was not involved in performance reporting before February 2001.



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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Manual - Printed Bill Retention	September 2000	August 2001	Yes	January 2001	Yes
Manual - Resend Spreadsheet	December 2000	August 2001	Yes	January 2001	Yes
Manual - Service Feature Availability Information	December 2000	August 2001	Yes	January 2001	Yes
Manual - Statistical Sampling Log	September 2000	August 2001	Yes	January 2001	Yes
Manual Coordinated Conversions	September 2000	August 2001	Yes	January 2001	Yes
Manual Update Information (excluding IN)	September 2000	August 2001	Yes	January 2001	Yes
Manual Update Information (IN only)	September 2000	August 2001	Yes	January 2001	Yes
Mentor	September 2000	August 2001	Yes	January 2001	Yes
MIHR	September 2000	August 2001	Yes	January 2001	Yes
MOR/Tel	September 2000	August 2001	Yes	January 2001	Yes
MPS Browser	September 2000	August 2001	Yes	January 2001	Yes
MTAS	September 2000	August 2001	Yes	January 2001	Yes
Nortel Meridian Max (BCS-ACD)	September 2000	August 2001	Yes	January 2001	Yes
Nortel Meridian Max (LSC-ACD)	September 2000	August 2001	Yes	January 2001	Yes
ORACLE (Website DB)	September 2000	August 2001	Yes	January 2001	Yes
PRS	September 2000	August 2001	Yes	January 2001	Yes
PRS+	September 2000	August 2001	Yes	January 2001	Yes
QMIS	September 2000	August 2001	Yes	January 2001	Yes
RAD (CCC ACD)	September 2000	August 2001	Yes	January 2001	Yes
RBS	August 2001	August 2001	Yes	January 2001	No
Reseller Report TSS tab	September 2000	August 2001	Yes	January 2001	Yes
Results Summary for Stats	September 2000	August 2001	Yes	January 2001	Yes
Returned Weekly Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
RRS	September 2000	August 2001	Yes	January 2001	Yes
SAS	September 2000	August 2001	Yes	January 2001	Yes
SOA	September 2000	August 2001	Yes	January 2001	Yes
TIRKS	September 2000	August 2001	Yes	January 2001	Yes





System	Oldest Data Currently	Current WI, IL, IN and OH	IN and OH	Current MI Benchmark	Meeting Current MI Benchmark?
	Retained	Benchmark	Benchmark?		
TNDS	September 2000	August 2001	Yes	January 2001	Yes
User Center Admin	September 2000	August 2001	Yes	January 2001	Yes
Database					
Vantive	October 2000	August 2001	Yes	January 2001	Yes
WebLex ¹⁷	April 2001	August 2001	Yes	January 2001	Yes
WFA/C ¹⁸	November 2000	August 2001	Yes	January 2001	Yes
WFA/DI	September 2000	August 2001	Yes	January 2001	Yes
WFA/DO	September 2000	August 2001	Yes	January 2001	Yes
Work Force Manager (WFM) ¹⁹	May 2002	August 2001	Yes	January 2001	Yes

Assessment

If source data is not retained, annual audits of historical data could be impeded. Attempts to trace errors in the reported results could be hindered by the lack of retention of source data, and SBC Ameritech may not be able to regenerate performance measurement reports as required.

Version 2: April 8, 2003

BearingPoint has continued to receive and review technical documentation from SBC Ameritech. BearingPoint's findings as of April 1, 2003, are outlined in Exhibits 3 and 4 below.

Exhibit 3 – Reporting System and System of Record Data Retention Results

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark? ²⁰	Current MI Benchmark	Meeting Current MI Benchmark? ²¹
ACIS ²²	February 2002	October 2001	No	January 2001	No
ALPSS	May 2001	October 2001	Yes	January 2001	No
ARIS/EXACT	April 2002	October 2001	No	January 2001	No
CABS	May 2002	October 2001	No	January 2001	No

¹⁷ According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

¹⁸ According to SBC Ameritech, this system was not involved in performance reporting before November 2000.

¹⁹ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

²⁰ Because the data retention requirements in WI, IN, OH and IL are not explicit regarding the type and length of retention, BearingPoint is using a benchmark of 18 months for retention of system of record and reporting system data. Data retention requirements stemming from the Indiana remedy plan, which was released in late October 2002, have not been incorporated into BearingPoint's current analysis due to the fact that SBC Ameritech and IURC have not agreed on an implementation schedule for the plan.

²¹ The data retention requirement in Michigan is as follows: "Data should be retained for a minimum of 24 months after the conclusion of the year in which the data was collected or 12 months after the issuance of the audit report, whichever is later." (May 27, 1999 Order, p. 11)

²² The data is not retained in compliance with regulatory requirements for the following measure groups: Billing (13 months), Provisioning and Ordering (December 2001).





System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark? ²⁰	Current MI Benchmark	Meeting Current MI Benchmark? ²¹
CAMPS	August 2002	October 2001	No	January 2001	No
CC MIS Wholesale Local Operations Center	March 2001	October 2001	Yes	January 2001	No
DUF Parity File ²³	90 Days	October 2001	No	January 2001	No
ICS/DSS ²⁴	October 2001	October 2001	In Retest	January 2001	No
Manual - COATS	May 2001	October 2001	Yes	January 2001	No
Manual – Directory Assistance Database Measures	October 2002	October 2001	No	January 2001	No
Manual – EBTA Clear Close	December 2001	October 2001	No	January 2001	No
NSDB	October 2001	October 2001	In Retest	January 2001	No
PAWS Website	December 2001	October 2001	No	January 2001	No
RBS	August 2001	October 2001	Yes	January 2001	No

As detailed in Exhibit 4, SBC Ameritech has demonstrated that it retained data from certain systems in compliance with requirements, based on a review of sample data.²⁵

Exhibit 4 - Additional Reporting System and System of Record Data Retention Analysis Results

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
114_115 Database	September 2000	October 2001	Yes	January 2001	Yes
ACIS ²⁶	September 2000	October 2001	Yes	January 2001	Yes
ACT	September 2000	October 2001	Yes	January 2001	Yes
AEMS LSOG 1	January 2001	October 2001	Yes	January 2001	Yes
ALDIS Data Warehouse	September 2000	October 2001	Yes	January 2001	Yes
ALPSS	May 2001	October 2001	Yes	January 2001	No
ANSIRS/Volumes	September 2000	October 2001	Yes	January 2001	Yes
ARAF Spreadsheet ²⁷	May 2002	October 2001	Yes	January 2001	Yes
BFR Database	September 2000	October 2001	Yes	January 2001	Yes
BFR Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes

²³ According to SBC Ameritech's data retention policy, the DUF Parity File is retained for 90 days.

²⁴The data was not retained in compliance with regulatory requirements for the following measure groups: Pre-Ordering, Ordering, Local Number Portability, Other Measures and Provisioning.

²⁵ Exhibits 1 and 2 do not represent an exhaustive list of systems of record and reporting systems.

²⁶ BearijngPoint validated that ACIS data was retained for the Maintenance and Repair and Other measure groups consistent with regulatory requirements.

²⁷ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.





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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Broadcast Fax Log	September 2000	October 2001	Yes	January 2001	Yes
CANS Database	September 2000	October 2001	Yes	January 2001	Yes
CC MIS Repair Centers (CSBs)	September 2000	October 2001	Yes	January 2001	Yes
CC MIS Wholesale Local Operations Center	March 2001	October 2001	Yes	January 2001	No
CLEC Comparison Report ²⁸	N/A	October 2001	Yes	January 2001	Yes
CLEC Online Website ²⁹	March 2001	October 2001	Yes	January 2001	Yes
CLEC Reports, Electronic (IN only)	September 2000	October 2001	Yes	January 2001	Yes
Closed Ticket Disposition Analysis ³⁰	October 2001	October 2001	Yes	January 2001	Yes
CODES NRD Due Report Final (Weekly Code Activation Spreadsheet)	September 2000	October 2001	Yes	January 2001	Yes
Collocation Database	September 2000	October 2001	Yes	January 2001	Yes
CORAL	September 2000	October 2001	Yes	January 2001	Yes
Electronic Performance Reporting Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
Error Return Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
FMOD Database	September 2000	October 2001	Yes	January 2001	Yes
Gateway RT62 ³¹	April 2001	October 2001	Yes	January 2001	Yes
Genesys CTI Reports Application ³²	October 2002	October 2001	Yes	January 2001	Yes
ICS/DSS ³³	April 2002	October 2001	Yes	January 2001	Yes
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²⁸ According to SBC Ameritech, no data has ever been generated for this system because SBC Ameritech has never had a request from a CLEC for this report.

²⁹ According to SBC Ameritech, this system was not involved in performance reporting before March 2001.

³⁰ According to SBC Ameritech, this system was not involved in performance reporting before October 2001.

³¹ According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

³² According to SBC Ameritech, this system was not involved in performance reporting before October 2002.

³³ According to SBC Ameritech, the data is retained for three years for the following measure groups: Billing, Interconnection Trunks, Maintenance and Repair, and 911. According to SBC Ameritech, this system was not involved in performance reporting for these measure groups before April 2002.





System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
LASR ³⁴	May 2002	October 2001	Yes	January 2001	Yes
LMOS	September 2000	October 2001	Yes	January 2001	Yes
LOC Scheduler	September 2000	October 2001	Yes	January 2001	Yes
LSMS	September 2000	October 2001	Yes	January 2001	Yes
Manual - AMA Critical Error Display Report	September 2000	October 2001	Yes	January 2001	Yes
Manual - Bill Timeliness	September 2000	October 2001	Yes	January 2001	Yes
Manual - COATS	May 2001	October 2001	Yes	January 2001	No
Manual - Completion Notification ³⁵	October 2000	October 2001	Yes	January 2001	Yes
Manual - Directory Assistance Database Measures ³⁶	September 2000	October 2001	Yes	January 2001	Yes
Manual - Electronic Completions	Septemb er 2000	October 2001	Yes	January 2001	Yes
Manual - EOI Network Database ³⁷	August 2001	October 2001	Yes	January 2001	Yes
Manual - Excluded Blocked Calls Report ³⁸	February 2001	October 2001	Yes	January 2001	Yes
Manual - Interface Outage Notification	Septemb er 2000	October 2001	Yes	January 2001	Yes
Manual - Printed Bill Retention	September 2000	October 2001	Yes	January 2001	Yes
Manual - Resend Spreadsheet	December 2000	October 2001	Yes	January 2001	Yes
Manual - Service Feature Availability Information	December 2000	October 2001	Yes	January 2001	Yes
Manual - Statistical Sampling Log	September 2000	October 2001	Yes	January 2001	Yes
Manual Coordinated Conversions	September 2000	October 2001	Yes	January 2001	Yes

According to SBC Ameritech, this system was not involved in performance reporting before May 2002.
 According to SBC Ameritech, this system was not involved in performance reporting before October 2000.

³⁶ BearingPoint validated that Manual – Directory Assistance Database Measures data was retained for the Other measure group consistent with regulatory requirements.

37 According to SBC Ameritech, this system was not involved in performance reporting before August 2001.

³⁸ According to SBC Ameritech, this system was not involved in performance reporting before February 2001.





System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Manual Update Information (excluding IN)	September 2000	October 2001	Yes	January 2001	Yes
Manual Update Information (IN only)	September 2000	October 2001	Yes	January 2001	Yes
Mentor	September 2000	October 2001	Yes	January 2001	Yes
MIHR	September 2000	October 2001	Yes	January 2001	Yes
MOR/Tel	September 2000	October 2001	Yes	January 2001	Yes
MPS Browser	September 2000	October 2001	Yes	January 2001	Yes
MTAS	September 2000	October 2001	Yes	January 2001	Yes
Nortel Meridian Max (BCS-ACD)	September 2000	October 2001	Yes	January 2001	Yes
Nortel Meridian Max (LSC-ACD)	September 2000	October 2001	Yes	January 2001	Yes
ORACLE (Website DB)	September 2000	October 2001	Yes	January 2001	Yes
PRS	September 2000	October 2001	Yes	January 2001	Yes
PRS+	September 2000	October 2001	Yes	January 2001	Yes
QMIS	September 2000	October 2001	Yes	January 2001	Yes
RAD (CCC ACD)	September 2000	October 2001	Yes	January 2001	Yes
RBS	August 2001	October 2001	Yes	January 2001	No
Reseller Report TSS tab	September 2000	October 2001	Yes	January 2001	Yes
Results Summary for Stats	September 2000	October 2001	Yes	January 2001	Yes
Returned Weekly Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
RRS	September 2000	October 2001	Yes	January 2001	Yes
SAS	September 2000	October 2001	Yes	January 2001	Yes
SOA	September 2000	October 2001	Yes	January 2001	Yes
TIRKS	September 2000	October 2001	Yes	January 2001	Yes
TNDS	September 2000	October 2001	Yes	January 2001	Yes
User Center Admin Database	September 2000	October 2001	Yes	January 2001	Yes
Vantive	October 2000	October 2001	Yes	January 2001	Yes
WebLex ³⁹	April 2001	October 2001	Yes	January 2001	Yes
WFA/C ⁴⁰	November 2000	October 2001	Yes	January 2001	Yes
WFA/DI	September 2000	October 2001	Yes	January 2001	Yes

According to SBC Ameritech, this system was not involved in performance reporting before April 2001.
 According to SBC Ameritech, this system was not involved in performance reporting before November 2000.



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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
WFA/DO	September 2000	October 2001	Yes	January 2001	Yes
Work Force Manager (WFM) ⁴¹	May 2002	October 2001	Yes	January 2001	Yes

⁴¹ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

This exception report is for discussion purposes only and is subject to change without notice.